

**D. GEORGE SWEIGERT
GENERAL DELIVERY
NEVADA CITY, CA 95959**

February 22, 2021

**Magistrate Judge Stewart D. Aaron
U.S. District Court
500 Pearl Street
New York, New York 10007-1312**

SUBJ: Compliance with ECF no. 214, 1:18-cv-08653-VEC-SDA

Your Honor,

Plaintiff Respectfully Requests a Thirty (30) Day Extension

1. On this date the Court has issued the subject ORDER (ECF. No. 214). Among other things, this ORDER amplifies the protocol to be followed by the Plaintiff in complying with said order.

2. Specifically, the ORDER states as follows:

In the interim, in responding to Defendant's discovery requests (as set forth in the Court's February 18, 2021 Order) Plaintiff shall identify every statement made by Defendant that Plaintiff claims was defamatory toward Plaintiff.

3. Plaintiff requests clarification of the time bounds of this discovery period. It is assumed that this time window begins one year before the filing of the Second Amended Complaint (Dkt. 88) up to and including the present. Thus, defamatory statements made by the Defendant AFTER September 9, 2018 would be considered as valid responsive statements to answer this interrogatory (*shall identify every statement*), to include up to the present.

4. The Plaintiff hereby requests a thirty (30) day extension of this deadline. The Defendant maintains over thirteen (13) social media properties which will require scanning to locate the hundreds of video podcasts produced by the Defendant concerning the Plaintiff. Such technical operations will require additional time for compiling, indexing and presentation to the Court.

Respectfully,



D. George Sweigert

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CERTIFICATE OF SERVICE

The undersigned hereby attests under penalties of perjury that copies of this communication have been sent via electronic mail message to the following parties on the nineteenth day (19th) of February, two thousand and twenty-one (2021).

Clerk of the Court, Room 200 U.S. District Court 500 Pearl Street New York, New York 10007-1312 EMAIL: temporary_pro_se_filing@nysd.uscourts.gov	Jason Goodman, CEO Multimedia System Design, Inc. 252 7th Avenue, Apart. #6S New York, NY 10001 truth@crowdsourcethetruth.org
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